

**ORASURE TECHNOLOGIES, INC.**  
**ANTI-CORRUPTION POLICY**  
**DECEMBER 11, 2025**

1. Introduction.

**Combating Corruption.** OraSure Technologies, Inc., including its subsidiaries and affiliates (collectively, the “Company”), operates in a wide range of legal and business environments, many of which pose challenges to the Company’s ability to conduct its business operations with integrity. The Company strives to conduct its business according to the highest standards of ethical conduct. Throughout its operations, the Company seeks to avoid even the appearance of impropriety in the actions of its directors, officers, employees, agents, and other Company Representatives (defined below).

Accordingly, this Anti-Corruption Policy (this “Policy”) reiterates the Company’s commitment to integrity and explains the specific requirements and prohibitions applicable to the Company’s operations under anti-corruption laws, including, but not limited to, the U.S. Foreign Corrupt Practices Act of 1977, as amended (“FCPA”). This Policy contains information intended to prevent corruption and bribery from occurring in the Company’s activities. The Company strictly prohibits all forms of corruption and bribery and will take all necessary steps to ensure that corruption and bribery do not occur in its business activities.

The Company’s Board of Directors is ultimately responsible for the implementation of this Policy and has designated the Company’s General Counsel to be the compliance officer (the “Compliance Officer”) responsible for the implementation, interpretation and administration of this Policy, including periodically reviewing this Policy and proposing any changes to this Policy that are deemed necessary or appropriate.

**The FCPA.** The FCPA contains two components, which are informally known as its “anti-bribery provisions” and its “accounting provisions.” In summary, the “anti-bribery provisions” prohibit the Company, Company Personnel and Company Representatives (as such terms are defined below) from offering, authorizing, promising, directing, or providing anything of value to any non-US government official for the purpose of influencing that person to assist the Company in obtaining or retaining business or securing an improper business advantage. Individuals and companies may also be penalized if they order, authorize, or assist someone else to violate the anti-bribery provisions, or if they conspire to violate those provisions.

The concept of prohibiting bribery is simple. However, understanding the full scope of the FCPA is essential as this law directly affects everyday business interactions between the Company and non-US governments and government-owned or government-controlled entities.

In addition to prohibiting improper payments, the FCPA also contains “accounting provisions” that impose additional record-keeping and internal control requirements on public companies like the Company. These accounting provisions do not just prohibit improper accounting of improper payments; they even prohibit improper accounting of *proper* payments. Put differently, even bona fide business expenses, if improperly accounted for in the books and records of the Company, can lead to a violation of the FCPA. The Company is committed to maintaining strong internal controls to ensure that its books and records are accurate and in conformance with the accounting provisions of the FCPA.

**FCPA Penalties.** Violations of the FCPA can result in violations of other US laws, including anti-money laundering, mail and wire fraud, and conspiracy laws. The penalties for violating the FCPA are severe. In addition to being subject to the Company’s disciplinary policies (including termination), individuals who

violate the FCPA may also be subject to imprisonment and fines. Under the anti-bribery provisions of the FCPA, Company Personnel or Company Representatives who violate the FCPA may be liable for up to \$10,000 in civil fines (adjusted annually for inflation) and, in the case of willful or other criminal violations, up to \$250,000 in criminal fines and imprisonment of up to five years. The FCPA prohibits indemnification of such individuals by the Company. The Company may be liable for civil fines up to \$10,000 (adjusted annually for inflation) and criminal fines up to \$2 million. Penalties for violations of the accounting provisions can be even more severe for the Company.

Aside from the FCPA, the Company may also be subject to other, possibly more strict, non-US anti-corruption laws, in addition to the local laws of the countries in which the Company conducts business. This Policy generally sets forth the expectations and requirements for compliance with those laws as well.

In addition, an FCPA violation could result in other adverse consequences such as suspension or debarment from government contracts, revocation or suspension of export license privileges, shareholder lawsuits, disgorgement, and long-term damage to the Company or an individual's reputation.

**Applicability.** This Policy is applicable to all of the Company's operations worldwide. This Policy applies to:

- all of the Company's directors, officers, employees, and individual contractors (collectively, "Company Personnel").
- the Company's agents, consultants, resellers, distributors, joint venture partners, and any other third-party representatives that, on behalf of the Company, have conducted business outside of the United States or interacted with non-US government officials or are likely to conduct business outside of the US or interact with non-US government officials (collectively, "Company Representatives").

Please note that this Policy applies in addition to (not in lieu of) the Company's other applicable policies and codes, including, but not limited to, the Company's Code of Business Conduct and Ethics.

Included below are summaries and explanations of some important FCPA provisions to assist you in your general understanding of the FCPA's requirements. You can find the full text of the FCPA at the DOJ's website, <http://www.justice.gov/criminal/fraud/fcpa/>, which also contains translations of the FCPA in many languages, including French, Spanish, German, Japanese, Cantonese, Mandarin, and Russian.

## 2. Prohibited Payments.

Company Personnel and Company Representatives are prohibited from directly or indirectly making, promising, authorizing, or offering "anything of value" (defined below)—not just payments of cash—to a non-US government official on behalf of the Company to secure an improper advantage, obtain or retain business, or direct business to any other person or entity. This prohibition includes payments, gifts, etc. to third-parties where the Company Personnel and Company Representatives knows, or has reason to know, that the third party will use any part of the payment or other thing of value for bribes. Company Personnel and Company Representatives are also prohibited from accepting any bribes. There is no minimum threshold or materiality requirement for corruption violations.

(a) **Cash and Non-Cash Payments: “Anything of Value.”** Payments that violate the FCPA may arise in a variety of settings and include a broad range of payments beyond the obvious cash bribe or kickback. The FCPA prohibits giving “anything of value” for an improper purpose. This term is very broad and can include, for example:

- Gifts and gift cards.
- Travel, meals, lodging or entertainment.
- Loans or non-arm’s length transactions.
- Charitable donations and sponsorships or political donations.
- Business, employment, or investment opportunities.
- Facilitation payments.
- Solicitation and extortion.

(b) **The FCPA prohibits both direct and indirect payments.** In addition to direct payments to non-US government officials, indirect payments through an agent, partner, subsidiary, consultant, or any other third party may **also** give rise to liability. The FCPA prohibits payments to any person while “knowing” that any part of the value will be provided to or otherwise used to influence the acts of a non-US government official.

Below are some “red flags” that may require further inquiry to ensure that improper payments are not being directed to government officials or other parties for an improper purpose:

- Requests for commissions that are unusually large in relation to the work to be performed;
- References by a local agent to “special accommodations” that have to be made with local officials or statements that you should not ask too many questions about how business gets done in the local jurisdiction;
- Hesitation on the part of an agent or consultant to provide the details of the services to be performed and statements that he or she will “do what it takes to get the deal done” in the local jurisdiction;
- Requests for “up front” payments when such payments are not expressly required by a written business agreement;
- Requests for payment to an offshore bank account, in cash, in a different name, to a shell corporation, to an account in a different country, through private payment procedures, or to an unrelated third party;
- Refusal by a prospective agent to commit in writing to comply with the Company’s compliance policies;
- Refusal to submit to or respond to the Company’s due diligence requests without a reasonable explanation;
- Refusal by a consultant to provide written reports of its activities;
- A history of illegal or questionable behavior by a prospective consultant;
- Family or business relationships between the Company’s agent and government officials;
- Requests by government officials that specific parties be engaged to provide services or materials to the Company;

- Requests that the Company's bid for services be made through a specific representative or partner; or
- Demands that payments only be made in cash.

(c) **Non-US Government Official.** The FCPA broadly defines the term non-US government official to include:

- Officers or employees of a non-US government (at any level) or any department, agency, or instrumentality thereof.
- Officers or employees of a company or business owned in whole or in part by a non-US government (a state owned or controlled enterprises).
- Officers or employees of a public international organization (such as the United Nations, World Bank, or the European Union).
- Non-US political parties or officials thereof.
- Candidates for non-US political office.

This term also includes **anyone acting on behalf of the above** including, but not limited to, the spouse, children and other immediate family members of a non-US government official.

On occasion, a non-US government official may attempt to solicit or extort improper payments or anything of value from Company employees or agents. Such employees or agents must inform the non-US government official that the Company does not engage in such conduct and immediately contact the Company's Compliance Officer or the Associate General Counsel.

(d) **Commercial Bribery.** Bribery involving commercial (non-governmental parties) is also prohibited under this Policy and the Company's Code of Business Conduct and Ethics. To this end, Company Personnel and Company Representatives shall not offer, promise, authorize the payment of, or pay or provide anything of value to any employee, agent, or representative of another company to induce or reward the improper performance of any function or any business-related activity. Company Personnel and Company Representatives also shall not request, agree to receive, or accept anything of value from any employee, agent, or representative of another company or entity as an inducement or reward for the improper performance of any function or business-related activity.

### 3. Permitted Payments.

The FCPA does not prohibit all payments to non-US government officials. In general, the FCPA permits three categories of payments discussed below. **Please note that while these payments might be permitted, to ensure legal compliance, all payments listed below must be pre-approved in writing by the Compliance Officer and properly recorded in the Company's books and records.**

(a) **Facilitating Payments.** The FCPA includes an exception for nominal payments made to low-level non-US government officials to ensure or speed the proper performance of a government official's routine, non-discretionary duties or actions, such as:

- Clearing customs.
- Processing governmental papers such as visas, permits, or licenses.

- Providing police protection.
- Providing mail, telephone, or utility services.

**Facilitating payments should be avoided to the maximum extent possible.** The anti-corruption laws of many nations prohibit such payments. Where it is not possible to avoid a facilitating payment, payments of a nominal value (i.e., up to \$100) might be permitted after written pre-approval from the Compliance Officer. If such pre-approval is not possible, any such payments must be reported to the Compliance Officer as soon as reasonably practicable by providing a detailed description of the need for the payment and the names of the non-U.S. officials involved.

(b) **Promotional Hospitality and Marketing Expenses or Pursuant to a Contract.** The Company may pay for the reasonable cost of a non-US government official's meals, lodging, or travel if, and only if, the expenses are bona fide, reasonable, and *directly related* to the promotion, demonstration, or explanation of Company products or services, or the execution of a contract with a non-US government or agency. Particular care must be taken when paying any such costs associated with a non-US government official to ensure it is clear that such payments are not intended, and cannot be perceived as being intended, to influence the government official in the exercise of his or her public functions. The principal guide in providing entertainment/hospitality is a rule of reasonableness. The Company should be cautious and conservative, and ensure that such expenditures conform to generally accepted local custom and are permitted under local law and the recipient's organizational guidelines. In certain countries, all gifts and hospitality to any government officials are prohibited or are strictly regulated by local law. Company Personnel and Company Representatives must not provide any gifts or business entertainment/hospitality that is excessive in nature or frequency, prohibited under local law, or otherwise inappropriate to any person, including but not limited to government officials. Any hospitality or entertainment expenses involving non-US government officials require written pre-approval from the Compliance Officer.

Keep the following rules in mind:

- Do not extend any invitation for travel to any government official, government employee, or political party, official, or candidate for political office, without the prior approval of the Company's Compliance Officer or their designated representative.
- Any travel or entertainment expenses must be limited solely to those individuals necessary for the furtherance of the Company's business. You cannot pay or promise to pay any travel or entertainment expenses for spouses or guests of your invitees.
- All travel and entertainment expenses must be accurately and adequately documented in the books and records of the Company; you must not misstate the purpose or value of these expenses.
- Legitimate gifts, meals, and entertainment are permitted only if they are of nominal value, infrequent, and not offered for an improper purpose.
- It is your obligation to ensure that a payment qualifies as a "reasonable and bona fide expense." If you have any questions or concerns, it is your obligation to consult the Company's Compliance Officer or their designated representative.

(c) **Promotional Gifts.** Promotional gifts of nominal value (i.e., up to \$100) may be given to a non-US government official as a courtesy in recognition of services rendered or to promote goodwill. These gifts must be nominal in value and should generally bear the trademark of the Company or one of its products. Gifts of cash or of substantial value, even if customary in the country at issue or relating to

the Company's products, generally will not be permitted. Providing any gift to a non-US government official requires written pre-approval from the Compliance Officer.

#### 4. Political and Charitable Contributions.

Contributions to candidates for political office on behalf of the Company are prohibited unless the Compliance Officer pre-approves them in writing. Charitable contributions to non-US charities on behalf of the Company must also be pre-approved in writing by the Compliance Officer.

Company Personnel and Company Representatives generally are not precluded from making personal charitable donations or political contributions allowable by law, whether in the United States or abroad, though the Company will not pay or reimburse for such payments. Any such payments should be made in such a way as make clear to any outside observer that they are purely personal, and are unrelated to any business of the Company. However, any Company Personnel who may solicit business from non-US government officials or otherwise interact with non-US government officials must receive prior approval in writing from the Compliance Officer before making any personal charitable donations or political contributions outside of the United States to avoid potential perceptions that such donations or contributions are related to the Company's business.

#### 5. Record-keeping.

The FCPA requires companies to maintain detailed and accurate accounting records and internal controls to ensure the books and records are accurate and complete. It is the Company's policy to implement and maintain internal accounting controls based upon sound accounting principles. All accounting entries in the Company's books and records must be timely and accurately recorded and include reasonable detail to fairly reflect transactions. There is no "scienter" or intent requirement, and there is no "materiality" threshold for these requirements. Accordingly, even a small misstatement or false record-keeping can give rise to liability. These accounting entries and the supporting documentation must be periodically reviewed to identify and correct discrepancies, errors, and omissions.

(a) **Authorization for Transactions.** All transactions involving the provision of anything of value to a non-US government official must occur only with appropriate Company authorization as detailed above.

(b) **Recording Transactions.** All transactions involving the provision of anything of value to a non-US government official must be recorded in accordance with generally accepted accounting principles.

(c) **Tracking Transactions.** All transactions involving the provision of anything of value to a non-US government official must be tracked in a separate log or record, with supporting documentation identifying:

- The name and position of the employees requesting and authorizing the transaction.
- The name and position of the non-US government official involved in the transaction.
- A description, including the value, of the payment or provision of anything of value, and where applicable, a description of the Company's products or services being promoted or the relevant contractual provision if the payment was made pursuant to a contract.

## 6. Cash Payments.

Cash payments of any kind to a third party, other than documented petty cash disbursements or other valid and approved payments, are strictly prohibited. Company checks shall not be written to “cash”, “bearer”, or anyone other than the party entitled to payment except to replenish properly used petty cash funds.

## 7. Representatives.

The Company might be held liable for actions of Company Representatives acting on the Company’s behalf. Therefore, all Company Representatives must fully comply with the FCPA and all other applicable laws and may not engage in activities that the Company or Company Personnel may not do directly.

Each of the Company Representatives, as well as any other third-party representatives that have or are likely to have contact with non-US governments officials on the Company’s behalf, must:

- Certify or represent that it complies with the FCPA, other relevant anti-bribery laws and this Policy;
- Commit in its contract with the Company to comply with the FCPA, other relevant anti-bribery laws and this Policy; and
- Not allow work to be subcontracted to another party without the Company’s written approval.

Where appropriate, the Company may take certain steps to ensure compliance with this Policy and applicable laws by Company Representatives, which may include conducting pre-retention due diligence of potential Company Representatives and monitoring the activities of Company Representatives when acting on behalf the Company to ensure compliance with this Policy and applicable laws.

## 8. Duty to Comply.

Company Personnel and Company Representatives must be familiar with and perform their duties according to the requirements set out in this Policy. Company Personnel who violate this Policy may be subject to disciplinary action, up to and including dismissal. Company Representatives who violate this Policy may be subject to termination of all commercial relationships with the Company.

To ensure that all Company Personnel are thoroughly familiar with the provisions of this Policy, the FCPA, and any other applicable anti-corruption laws, the Company shall provide anti-corruption training and resources to Company Personnel as appropriate.

Any Company Personnel who suspect that this Policy may have been violated must immediately notify the Company as specified in the section entitled “Reporting Policy Violations” below. Any member of the Company’s Personnel who, in good faith, reports suspected legal, ethical, or Policy violations will not suffer any adverse consequence for doing so. When in doubt about the appropriateness of any conduct, the Company requires that you seek additional guidance from the Compliance Officer before taking any action that may subject the Company to potential liability.

9. Duty to Cooperate.

The Company may at times undertake a more detailed review of certain transactions. As part of these reviews, the Company requires all Company Personnel and Company Representatives to cooperate with the Company, outside legal counsel, outside auditors, or other similar parties. The Company views failure to cooperate in an internal review as a breach of your obligations to the Company, and will deal with this failure severely in accordance with this Policy, other internal Company policies, and any local laws or regulations.

10. Questions About the Policy.

Company Personnel with questions about the FCPA or other anti-corruption laws, or who are uncertain of the requirements of this Policy, are obligated to seek guidance from their superiors and/or the Compliance Officer or their designated representative.

The Compliance Officer also has responsibility for investigating, or overseeing the investigation of, any information or allegations concerning possible violations of anti-corruption laws or other unethical or improper business conduct. The Compliance Officer will have authority to retain and consult with outside legal counsel to assist in carrying out their duties.

It is understood that Company Personnel will often go to their immediate supervisor to seek guidance on ethics-related issues or report potential violations of the Company's Code of Business Conduct and Ethics, this Policy, or other rules and regulations. However, there may be situations in which Company Personnel do not wish to raise such issues with their supervisors. Such situations include instances where the conduct in question involves a supervisor, where the employee has reported the conduct previously and does not believe that the supervisor has dealt with it properly, or where the employee does not feel that the matter can be appropriately discussed with their supervisor. In these types of situations, Company Personnel should raise the matter with the Compliance Officer, either directly or anonymously.

Note: Each Company officer, director, or employee has an independent and continuing obligation to ensure compliance with the FCPA. Simply reporting potential issues to a supervisor does not absolve you from all responsibility relating to improper conduct.

11. Reporting Policy Violations.

To report potential violations of this Policy, immediately notify your Supervisor or the Compliance Officer, or reports can be made as follows:

(a) **Toll-Free Telephone:**

English speaking (U.S. and Canada):	(844) 860-0008
Spanish speaking (U.S. and Canada):	(800) 216-1288
French speaking (Canada):	(855) 725-0002
Spanish speaking (Mexico):	01-800-681-5340
All Other Countries:	(800)-603-2869*

\*Must dial country access code first

(b) **Web Reporting:** [www.lighthouse-services.com/orasure](http://www.lighthouse-services.com/orasure)

- (c) **E-mail:** reports@lighthouse-services.com (Must include the Company name with report)
- (d) **Facsimile:** (215) 689-3885 (Must include the Company name with report)

A complaint about a suspected violation should be factual rather than speculative or conclusory and should contain as much specific information as possible to allow for proper assessment. The complaint describing an alleged violation of the FCPA or this Policy should set forth all of the information that the employee knows regarding the allegation or concern.

### **Anonymity**

The Company recognizes that some people may feel more comfortable reporting a suspected violation anonymously.

An officer or employee who wishes to remain anonymous may do so in accordance with this Section 11. If a report is made anonymously, however, the Company may not have sufficient information to investigate or evaluate the allegations. Accordingly, persons who report suspected violations anonymously should provide as much detail as they can to permit the Company to evaluate the allegation and, if it deems appropriate, conduct an investigation.

## **12. Obligations and Consequences**

This Policy imposes several obligations on Company employees and other Company Personnel. These obligations will be enforced by the standard disciplinary measures available to the Company, up to and including termination of employment.

(a) **Reporting Obligations** Upon becoming aware, Company Personnel must immediately report to the Compliance Officer any suspected or actual violation of anti-corruption laws of by the Company or any of its officers, directors, or employees, or any other third-party such as agents, business partners, consultants, or others acting on the Company's behalf. Once an individual has made a report, the person has an obligation to update the report as new information comes into their possession.

Under no circumstances shall the reporting of any such information or possible violation serve as a basis for any retaliatory actions to be taken against any individual making the report.

(b) **Third Party and Due Diligence Obligations.** All Company Personnel have an obligation to ensure that third-party agents or business partners with whom they seek to establish a relationship on behalf of the Company are properly investigated to ensure compliance with the FCPA and this Policy. One step to ensure compliance is to conduct due diligence on agents or partners who conducts business in any non-US jurisdiction before entering into third-party relationships, contracts, or agreements.

The Compliance Officer can provide you with guidance regarding the appropriate level of due diligence depending on the situation, and can direct you to individuals who can assist in performing this due diligence. If you have concerns about the type and scope of diligence required by a particular situation, it is your responsibility to raise any questions or concerns with the Compliance Officer. An employee who observes a "red flag" during the due diligence process must work with the Compliance Officer to resolve that "red flag" through investigation before proceeding to engage the third-party agent or business partner.

(c) **Disciplinary Action.** If an employee or contractor violates the FCPA or any provision of this Policy (including, without limitation, this Policy’s prohibition against retaliation), or fails to cooperate in implementing this Policy, the employee will be subject to disciplinary action, which may include, but not be limited to, suspension, demotion, reduction in pay, reprimand, and termination of employment/business relationship.

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